

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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JEFFREY STEINBACH,  
Plaintiff,

CASE NO.:

vs.

ERSI EQUITABLE RECOVERY SOLUTIONS, INC.  
and TRANS UNION, LLC;  
Defendants.

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**TRANS UNION, LLC'S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the Circuit Court for Baltimore County, Maryland, to the United States District Court for the District of Maryland, on the following grounds:

1. On or about September 26, 2011, Plaintiff Jeffrey Steinbach, pro se, filed a Complaint in the District Court for Baltimore County, Maryland (the "District Court") and therein demanded a jury trial. See District Court Complaint Form and Complaint, at 8, attached hereto as **Exhibits A** and **B**, respectively.<sup>1</sup> On or about November 3, 2011, due to Plaintiff's request for a jury trial, the matter was transferred from the District Court to the Circuit Court for Baltimore County, Maryland. See Notice, attached hereto as **Exhibit C**. Trans Union received the Notice on November 7, 2011.
2. A copy of the court dockets and other document(s) on file with the same or sent to Trans Union are attached hereto as **Exhibit D**.

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<sup>1</sup> The exhibits accompanying the Complaint have been redacted pursuant to Fed. R. Civ. P. 5.2. If requested by the Court, Trans Union can file unredacted copies under seal.

3. Plaintiff alleges that Trans Union violated, and is liable under, the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (the "FCRA"). *See* Complaint, at 6-8.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

5. Pursuant to 28 U.S.C. § 1441, *et seq.*, this cause may be removed from the Circuit Court for Baltimore County, Maryland, to the United States District Court for the District of Maryland.

6. After reasonable inquiry, as of the date of this Notice Of Removal, Defendant ERSI Equitable Recovery Solutions, Inc. has not been served.

7. Notice of this removal will promptly be filed with the Circuit Court for Baltimore County, Maryland and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Circuit Court for Baltimore County, Maryland to this United States District Court, District of Maryland.

Dated: November 18, 2011.

Respectfully submitted,



/s/ H. Mark Stichel

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*Counsel for Trans Union, LLC*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **18th day of November, 2011**, properly addressed as follows:

<b><u>Pro Se Plaintiff</u></b>	
Jeffrey Steinbach	
12 Creek Side Court	
Middle River, MD 21220	

/s/ H. Mark Stichel

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